

The Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

SOLOWHEEL, INC.,

Plaintiff,

v.

NINEBOT INC. (USA), D/B/A NINEBOT  
U.S., INC.; NINEBOT (TIANJIN)  
TECHNOLOGY CO., LTD.; NINEBOT, INC.  
(China),

Defendant.

Case No. 3:16-cv-05688-RBL

**JOINT STATUS REPORT WITH  
PROPOSED DATES AND [PROPOSED]  
ORDER**

**NOTE ON MOTION CALENDAR:  
DECEMBER 7, 2018**

Pursuant to the Court's November 28, 2018 Order, the Parties provide the following update. The Parties are prepared to promptly proceed to a Claim Construction Hearing at the Court's convenience, while also respecting holiday conflicts and travel. The Parties have not made any additional progress on informal resolution of the issues in the case.

The Parties' proposed deadlines for the remainder of the case are as follows:

	<b>Proposed Date</b>
Markman hearing	January 14, 2019, or such time around said date as convenient for the Court.

Completion of fact discovery	The Parties respectfully assume a Markman ruling approximately three months from the hearing June 7, 2019
Expert Witness Disclosure/Reports under FRCP 26(a)(2)	July 19, 2019.
Rebuttal Expert Disclosure/Reports	August 23, 2019.
Completion of expert discovery	September 20, 2019.
Dispositive motions	November 8, 2019.
Attorney settlement conference	January 20, 2020.
Mediation to be completed	February 3, 2020.
Motions in Limine	February 3, 2020.
Pretrial Order	February 17, 2020.
Trial briefs	February 24, 2020.
Voire dire/jury instructions/Start of 5 day Trial	March 9, 2020.

//

//

//

//

//

//

//

//

//

1 Dated: December 7, 2018

2  
3 *Respectfully submitted,*

4 By: s/ Benjamin J. Hodges

Benjamin J. Hodges, WSBA #49301

5 Kevin Ormiston, WSBA #49835

6 FOSTER PEPPER PLLC

1111 3rd Avenue, Suite 3000

7 Seattle, WA 98110

Telephone: (206) 447-4400

8 Fax: (206) 749-1940

9 E-mail: Ben.Hodges@foster.com,

Kevin.Ormiston@foster.com

10 *Counsel for Plaintiff Solowheel, Inc.*

By: s/ Cameron H. Tousi

Cameron H Tousi (admitted *pro hac vice*)

IP LAW LEADERS PLLC

6701 Democracy Blvd, Ste 555

Bethesda, MD 20817

Telephone: (202) 248-5410

Email: chtousi@ipllfirm.com

Al Van Kampen

VAN KAMPEN & CROWE PLLC

1001 Fourth Avenue, Ste 4050

Seattle, WA 98154

Telephone: (206) 386-7353

Fax: (206) 405-2825

Email: AVanKampen@VKClaw.com

*Counsel for Defendant*

*Ninebot (Tianjin) Technology Co., Ltd.*

15 **[PROPOSED] ORDER**

17 Based on the foregoing stipulation of the parties, IT IS SO ORDERED

19 DATED this \_\_\_\_ day of \_\_\_\_\_, 2018.

22 \_\_\_\_\_  
THE HONORABLE RONALD B. LEIGHTON  
UNITED STATES DISTRICT JUDGE